

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
AT JACKSON ~~DIVISION~~

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, JACKSON

Plaintiff(s)

*[List the names of all plaintiffs
filing this law-suit; Do not use
"ET AL"]*

Shaun Pierce,

TDOC # 303410,

pro se,

TDOC # _____,

TDOC # _____,

vs

CIVIL ACTION NO. _____

STATE OF TENNESSEE;

*[To be assigned by the Clerk's Office.
Do not write in this blank]*

Defendant(s)

*[List the names of all defendants
against whom you are filing this
law-suit; Do not use "ET AL"]*

Tony Parker, Warden;

Brenda Jones,

Deputy Warden.

**IF YOU NEED MORE SPACE TO LIST OTHER PLAINTIFFS AND/OR DEFENDANTS,
INDICATE SO AND ATTACH A SEPARATE SHEET OF PAPER**

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C. §§ 1983

I. PREVIOUS LAWSUITS

- A. Have you or any of the other plaintiffs listed above, filed any other lawsuits in the United States District Court for the Middle District of Tennessee and/or in any other state or federal court?

YES _____

NO ✓

B. If you answered YES to Question A, list the following information:

[If you have filed more than one lawsuit, list the additional lawsuits on another sheet of paper, using the same outline as below.]

1. Parties to previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

2. In what Court did you file the previous lawsuit?

[If federal Court, name the district; if state court, name the county.]

3. Case number of the previous lawsuit: _____

4. Name of Judge to whom the case was assigned: _____

5. When did you file the previous lawsuit? *(indicate the year if you do not know the exact month or day.)* _____

6. What was the disposition or result of the previous lawsuit? *(For example, was it dismissed, appealed, or still pending.)* _____

7. When was the previous lawsuit decided by the court? *(indicate the year if you do not know the exact month or day.)* _____

8. Did the previous lawsuit involve the same facts or circumstances that you are alleging in the lawsuit you are submitting?

YES _____ NO _____

II. PLACE OF PLAINTIFF(S) CURRENT CONFINEMENT:

A. Name the prison or jail in which you are currently incarcerated: NorthWest
Correctional Complex - 960 State Route 212
Tiptonville, Tennessee 38079

B. Are the facts of your lawsuit related to your confinement in your present prison or jail?

YES ☒ NO ☐

C. If you answered NO to Question B, list the name and address of the jail or prison to which the facts of your lawsuit relate: _____

D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?

YES ☒ NO ☐

E. If you answered YES to Question D, did you present these facts to the prison authorities through the state prisoner grievance procedure?

YES ☒ NO ☐

F. If you answered YES to Question E;

1. What steps did you take? Filed a Grievance, wrote letters
to both Wardens, my counselor, and Internal Affairs.
2. What was the result? I was told I had exceeded the 7 day
time limit, in which to file such. I was incapacitated.

G. If you answered NO to Question E, explain why not: _____

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of first Plaintiff: Shaun David Pierce
Prison ID Number of First Plaintiff: 305410
Address of First Plaintiff: NorthWest Correctional Complex
960 State Route 212, Tiptonville, Tennessee 38079
2. Name of Second Plaintiff: _____
Prison ID Number of First Plaintiff: _____
Address of First Plaintiff: _____

3. Name of Third Plaintiff: _____
Prison ID Number of First Plaintiff: _____
Address of First Plaintiff: _____

[If there are more than three plaintiffs, list their Names, Prison Identification Numbers and addresses below or on an attached sheet of paper]

B. Defendants against whom you are filing this lawsuit:

[For each defendant, check whether you are naming the defendant in his or her individual and/or official capacity.]

1. Name of First Defendant: Tony Parker - Warden
Place of Employment of First Defendant: NorthWest Correctional Complex
Address of First Defendant: 960 State Route 212
Tiptonville, Tennessee 38079

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of Second Defendant: Brenda Jones - Deputy Warden
Place of Employment of Second Defendant: NorthWest Correctional Complex
Address of Second Defendant: 960 State Route 212
Tiptonville, Tennessee 38079

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

3. Name of Third Defendant: _____
Place of Employment of Third Defendant: _____
Address of Third Defendant: _____

Named in official capacity? ☐ Yes ☐ No

Named in individual capacity? ☐ Yes ☐ No

[If you are bringing this lawsuit against more than three defendants, you must list each defendant's name, place of employment, address, and capacity in which you are suing the defendant on an attached sheet of paper]

IV. STATEMENT OF YOUR CLAIM

State as briefly as possible the facts of your case. Recite the dates when any incidents or events occurred, and the places where such incidents or events took place. Describe how each defendant is involved. Also, include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set each claim in a separate paragraph.

I, Shaun David Pierce #305410, was on P.C. in
Unit 5, cell 50; on 10.9.2010, with inmate Bobby Bain
#381817, as my cellmate. On this date, my cellmate had
been drinking alcohol, and had acquired a home-made

knife, with which he attacked me with, resulting in me being stabbed 23 times, by Bobby Bain. I was rushed to the ER at Union City Hospital, where I was Life Flighted to the Memphis Medical Center. I temporarily died while in flight to Memphis Med, and again a second time while undergoing emergency surgery. My family was never notified of this incident, and no one from Internal Affairs has come to inquire as to what, and why this incident occurred. There have been no charges placed against inmate Bain for this attempt at murder. However, inmate Bain did receive a letter from the Aryan Nation that stated if he would carry out this attack, that the Aryan Nation would allow Bain to return to general population without retrobution for going into Protective Custody, in the first place.

[If you need additional space, attach an additional sheet of paper as necessary.]

V. RELIEF REQUESTED: List what you want the Court to do; list what relief you seek as it relates to each individual defendant.

- A. \$150,000.⁰⁰ compensatory & punitive damages
- B. Immediate release on state probation or transfer to
- C. another prison, of my choice.
- D. _____
- E. _____

I (we) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 2 day of September, ~~2010~~ 2011.

Signature: Shaun David Pierce

Prison ID Number: 305410

Address: 960 State Route 212
Tiptonville, TN. 38079-4037